

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR
9004-1(b)**

**Edmond M. George, Esquire
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*Counsel to Defendants Javier Torres, Media Effective, LLC, Dora Dillman, Javier Torres, Jr., Natalia Torres, Paulina Torres.***

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC, *et al.*,¹

Debtors.

AIRN LIQUIDATION TRUST CO., LLC, in its capacity as Liquidation Trustee of the AIRN LIQUIDATION TRUST,

Plaintiff,

v.

MEDIA EFFECTIVE LLC, *et al.*,

Defendants.

Chapter 11

Case No: 22-14539-JKS

(Jointly Administered)

Adv. Pro. No. 23-1335-JKS

NOTICE OF MOTION OF JAVIER TORRES, MEDIA EFFECTIVE, LLC, DORA DILLMAN, JAVIER TORRES, JR., NATALIA TORRES, AND PAULINA TORRES TO QUASH THE SUBPOENAS TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING) DIRECTED TO BANK OF AMERICA, NEW YORK LIFE INSURANCE COMPANY, WESTERN-SOUTHERN LIFE ASSURANCE COMPANY, AND MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>.

PLEASE TAKE NOTICE that on **June 4, 2024**, at **10:00 a.m.** (Eastern Time), or as soon thereafter as counsel may be heard, Javier Torres (“Javier”), Media Effective, LLC (“Media”), Dora Dillman, Javier Torres, Jr., Natalia Torres, Paulina Torres (the “Torres Family,” and collectively with Javier and Media, the “Defendants”), by and through their undersigned counsel, will move before the Honorable John K. Sherwood, United States Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, Courtroom 3D, for entry of an order, substantially in the form submitted herewith, to Quash the Subpoenas to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Bankruptcy Case (or Adversary Proceeding) Directed to Bank of America (the “BoA Subpoena”), New York Life Insurance Company (the “NY Life Subpoena”), Western-Southern Life Assurance Company (the “WS Life Subpoena”), and Massachusetts Mutual Life Insurance Company (the “Mass Life Subpoena” and together with the BoA Subpoena, the NY Life Subpoena, and the Mass Life Subpoena, the “Subpoenas”) (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Defendants shall rely upon the Motion submitted concurrently herewith, the Declarations of Javier Torres, Edmond George, and exhibits thereto.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby waived unless timely objection is received.

PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

Respectfully Submitted,

Dated: May 8, 2024

/s/ Edmond M. George

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